

LAW OFFICES OF
BILFIELD & ASSOCIATES

Experience, Integrity and Personal Attention Since 1974

Phone: 216-696-LAWS (5297)

6300 Rockside Road * Suite 204
Independence, Ohio 44131

Fax: 216-573-9725

February 16, 2017

VIA EMAIL ONLY

Madeline B. Dennis, Esq.
madeline.dennis@tuckerellis.com
Edward E. Taber, Esq.
edward.taber@tuckerellis.com
Tucker Ellis
950 Main Avenue, Ste 1100
Cleveland, Ohio 44113

Sarah E. Kutscher, Esq.
skutscher@ohioedlaw.com
David K. Smith, Esq.
dsmith@ohioedlaw.com
David S. Hirt
dhirt@ohioedlaw.com
Smith Peters Kalail Co., LPA
6480 Rockside Woods Blvd., Suite 300
Cleveland, Ohio 44131

Re: *Jane Doe #1, et al v Mayfield City School Dist. Bd of Ed, et al.*

Dear Counsel;

Enclosed please find Amended Notice to Take Deposition of Defendant, Mayfield City School District Board of Education, Pursuant to Rule 30(b)(6) FRCP with Duces Tecum Annexed. Your attention is directed to both the Amended Exhibit "A" concerning the "Matters on Which Examination is Requested" and the Amended Duces Tecum. I bold-faced the additional documents in the Duces Tecum not previously stated on the original Duces Tecum, and the additional "matters on which examination is requested" on Exhibit "A" similarly not stated on the original Exhibit "A".

I would also like to take the depositions of the following individuals, commencing at 1:00 p.m. on March 2, 2017, who were listed on my letter to counsel on December 28, 2016; to wit:

Nancy Barron – Phys Ed Teacher, Girls Track Coach
Anthony Capora
Frank Stubsky
Michael Barnes
Keith Leffler

Kindly advise your and their availability.

Very truly yours,

/s/ Murray D. Bilfield

Murray D. Bilfield
BILFIELD & ASSOCIATES
MDB/srs

Enclosure

